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*Attorneys for Defendants* **CITY OF LOS ANGELES, RICHARD H. ULLEY,**  
and **LOS ANGELES POLICE DEPARTMENT**

**UNITED STATES DISTRICT COURT**

**CENTRAL DISTRICT OF CALIFORNIA**

MARCO MILLA,

Plaintiff,

V.

CITY OF LOS ANGELES, a municipal  
entity; LOS ANGELES POLICE DEPT., a  
municipal entity; DETECTIVE R. ULLEY,  
AND DETECTIVE J. VANDER HORCK,  
and DOES 1 through 10, inclusive

Defendants.

**CASE NO. CV16-00134 SVW(AJWx)**

Honorable Judge: Stephen V. Wilson

Honorable Mag. Judge Andrew J. Wistrich

**OBJECTION TO MOTION FOR  
ORDER TO USE DEPOSITION  
TESTIMONY CONTAINED  
WITHIN WRIT FOR HABEAS  
CORPUS AD TESTIFICANDUM  
(ECF 231)**

**TO THE ABOVE-ENTITLED COURT AND TO PLAINTIFF AND  
THEIR COUNSEL OF RECORD:**

Please be advised that Defendants CITY OF LOS ANGELES, RICHARD H.  
ULLEY, and LOS ANGELES POLICE DEPARTMENT object to the motion for  
order allowing the deposition of Ramar Jenkins to be used in lieu of live testimony.  
Said motion does not comply with L.R. 7-3, and other notice requirements. There

1 were objections raised as to inadequate notice and method of taking said deposition  
2 pending at time of deposition. Those objections need to be sorted out via motion and  
3 hearing practice prior to the deposition being used in lieu of live testimony.

4 Jurors should view this key witness in person, as he has suddenly changed his  
5 trial testimony after 20 years, and after a visit by plaintiff's counsel, so defendants  
6 do not oppose the writ for habeas corpus ad testificandum.

7 DATED: April 12, 2022

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9 **MICHAEL N. FEUER**, City Attorney  
10 **SCOTT MARCUS**, Chief Assistant City Attorney  
11 **CORY M. BRENT**, Senior Assistant City Attorney

12 By: /s/ *Geoffrey Plowden*  
13 **GEOFFREY PLOWDEN**  
14 Deputy City Attorney

15 *Attorneys for Defendants, CITY OF LOS*  
16 **ANGELES RICHARD H. ULLEY**, and **LOS**  
17 **ANGELES POLICE DEPARTMENT**  
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